

ABELSON & TRUESDALE, LLC

By: Steven J. Abelson, Esq.

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Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:

JOSEPH & RUTH CARRANO

Debtor.

Case No. 16-22887 (MBK)

Chapter 13

**MOTION TO ENFORCE CHAPTER 13
PLAN AND COURT ORDER OF 1/25/18;
DEEMING MORTGAGE CURRENT;
COMPELLING PAYMENT OF TAX
ESCROW AND AWARDING FEES**

Hearing Date: **July 24, 2018 @ 9:00 A.M.**

To:

Clerk, United States Bankruptcy Court
United States Bankruptcy Court
402 E. State Street
Trenton, New Jersey 08608

Warren S. Jones, LLC
1 Trinity Lane
Mt. Holly, NJ 08060
Attorney for Kondaur Capital

Albert Russo, Trustee
CN 4853
Trenton NJ 08650

S. Renee Blume, Esq.
Prober & Raphael
20750 Ventura Blvd., Suite 100
Woodland Hills, CA 91364

Kondaur Capital Corp (As servicer for
Wilmington Savings Fund Societs FSB..)
333 South Anita Drive, Suite 400
Orange, CA 92868
*Attention: Officer, Director, Managing Agent
or Other Individual Authorized to Accept
Service of Process*

PLEASE TAKE NOTICE that on July 24, 2018 at 9:00 in the forenoon, or as soon as

counsel may be heard, the undersigned attorney for the Debtor, Joseph & Ruth Carrano, will move before the UNITED STATES BANKRUPTCY COURT, Honorable Michael B. Kaplan, presiding, 402 E. State Street, TRENTON, NEW JERSEY, 08608 for an Order to enforce the provisions of the confirmed Chapter 13 Plan per 11 U.S.C. § 1327(a) and § 524(i) ; compelling the Creditor to deem the post petition mortgage account current and awarding fee and costs for the necessity of the within application.

PLEASE TAKE FURTHER NOTICE that Debtor shall rely upon the attached certification in support of the application and that pursuant to Local Rule 9013-1, it is submitted that no brief is necessary as issues presented are clear and concise, oral argument is not requested and a proposed form of order is submitted herewith.

/s/ Steven J. Abelson
STEVEN J. ABELSON, ESQ.
Attorney for Debtor

Dated: July 3, 2018